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Attorney for Debtor
JB – 1479

In re:

WHITE MARINE, INC.

Debtor.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Chapter 11

Case No. 15-23627 MBK

**CERTIFICATION IN SUPPORT
OF MOTION AUTHORIZING PARTIAL SALE OF
THE DEBTOR'S ASSETS FREE AND CLEAR OF LIENS**

Jennifer Billand, of full age, certifies as follows:

1. I am the president of the debtor. As such, I have full knowledge of all statements made.
2. The debtor is a corporation involved in the construction industry which maintains its principal place of business in Perth Amboy, New Jersey.
3. In connection with its business, the debtor owns certain equipment which it utilizes in its business operations.
4. On July 21, 2015, the debtor filed a voluntary Chapter 11 petition as a result of cash flow problems caused by the underbidding of certain jobs.
5. Among the equipment and vehicles of the debtor are those assets listed on Schedule A. The debtor no longer has any need for these items and seeks to sell them to

Reich Brothers, LLC for the sum of \$115,828.00 pursuant to the terms of the purchase offer received from them, a copy of which is attached as Exhibit B.

6. The sale is not dependent upon the purchaser obtaining financing for the equipment. A ten percent deposit has been received and the balance will be paid in full upon court approval of the sale, at which time the proposed purchaser will be permitted to take possession of those items being sold.

7. The equipment is being sold is subject to a secured claim of Wells Fargo Bank, N.A., the debtor proposed to pay the entire proceeds of the sale of the equipment to Wells Fargo Bank, N.A. in order to reduce the total amount due to them. The vehicles are not subject to any lien of Wells Fargo Bank, N.A. The proceeds of the sale of those items will not be paid to Wells Fargo Bank, N.A., but instead shall be used to fund the debtor's plan.

8. The assets were appraised by Alan Atkins Appraisals on July 5, 2015 for \$161,150.00; \$145,650.00 for the equipment and \$15,500.00 for the vehicles. As such, the purchase price is 72% of the appraised value. It should be noted, however, there are no costs of sale to paid from this transaction. The apportionment proposed between the amount for the equipment and the vehicles is pursuant to respective values of these items in the appraisal.

9. As a result, the debtor believes the amount being paid for the assets is fair and reasonable, and will provide the best opportunity to maximize the value of the assets for the benefit of the debtor's estate.

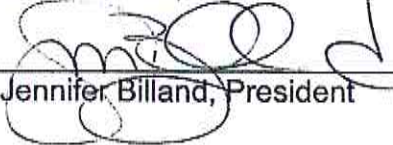
10. The proposed purchaser requires that the assets be sold free and clear of any liens, claims and encumbrances and the debtor requests that the order approving the sale provide this.

11. The proposed purchaser of the assets is unrelated in any manner to the debtor whatsoever. The sales price was obtained through a direct negotiation between myself and representatives of the proposed purchaser.

12. I am also requesting that any provision which may exist in the Bankruptcy Code that would serve to stay consummation of the sale be waived so that the proposed sale may be effected immediately.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

WHITE MARINE, INC.

By: 
Jennifer Billand, President

Dated: September 22, 2015

SCHEDULE A

Shop Area

- 1 Lincoln Idealarc model R3R-500 DC arc welder, s/n A522247
- 1 Miller model SRH444 portable DC arc welder, s/n T444507
- 1 H-Frame hydraulic shop press, no name or capacity visible
- 2 Lincoln Vantage 500 model K2272-1 stick & wire welders
s/n U1040710913 & A1030700061
w/ Cummins B3.3, 4 cylinder diesel engines
- 1 Cuntrex beam mounted jib crane, ~14'-0 long
w/ Budgit electric chain hoist, 1 ton capacity
w/ pendent control
- 1 Piranha model P90 ironworker, s/n P90-1256 (1988), 90 ton
- 1 Marvel No. 18/M1 hydraulic universal roll-stroke hack saw
s/n 848180 (1956), 18" x 18"
- 1 Max model Co16 abrasive cut-off saw, s/n Co-301, 16" blade
w/ casters
- 1 Lincoln Idealarc model R3R-300 DC arc welder, s/n not visible
- 1 Custom welding positioner
w/ slotted T-bed, 60" wide x 266" long
w/ Falk Ultramax gear drive
w/ fixture, 28" diameter
- 1 Porter Cable model G8 vertical belt grinder, s/n not visible
8" wide belt (not operating)
- 1 Kiamaster model 4NEII-600 CNC turning center
s/n NE6468 (1986)
w/ Fanuc System 3T CNC control
w/ Turbo Conveyor model 6298-8250 chip conveyor
s/n 307706
- 1 Cincinnati Machine U.K. model Arrow 2000 CNC
vertical machining center
s/n 7057-F00-990062 (1999)
w/ GE Fanuc Series 18i-M CNC control
w/ 21 position tool changer (damaged)
w/ 30" x 90" table

- 1 Lincoln Ranger 305G (K1726-3/11169) portable welder
s/n U1040823982 (1,563 hours indicated on meter)
w/ gas engine
- 1 Lincoln Ranger 275 (K1641-1/10543) portable welder
s/n U1000206864 (1,542 hours indicated on meter)
9,000 watts w/ Kohler gas engine
- 1 Komatsu model FG25ST-11 LPG forklift truck, s/n 405953A
4,480 lb. capacity, 188" lift height
- 1 Lincoln model R3R-500 DC arc welder, s/n AC445996
- 1 Mazak model VQC-20/50B CNC vertical machining center
s/n 63485 (12-85)
w/ Mazatrol Cam M-2 CNC control
- 1 Yale model GLP080LCJSBV098 LPG forklift truck
s/n N428024, 8,000 lb. capacity, 142" lift height
- 1 Miller Syncrowave 250 AC/DC arc welding power source
s/n not visible
w/ Bernard radiator
- 1 Pedestal jib crane, 7'-0 arm
w/ Dayton trolley, 1 ton
w/ Yale manual chain hoist
- 1 Lucas model 41 horizontal boring mill, s/n 41-7-9 (1935)
3" with 34" x 48" rotary table
- 1 Lucas model 41 horizontal boring mill, s/n 41-9-24 (1936)
3" with 34" x 48" rotary table
w/ Mitutoyo KC-32 X-Y dro
- 1 H-frame hydraulic shop press, no name visible
7'-0 wide x 9'-0 high
w/ hydraulic pump and ram
- 1 Lincoln model CV-300 (10160) Mig welder, s/n U1990203062
w/ model LN-7 wire feeder, s/n 01981201494
- 1 Quincy air compressor model 325-16
w/ 5 H.P. motor
w/ vertical tank

- 1 Spray booth, 12'-0 wide x 14'-0 deep w/ fan
- 1 Lincoln Invertec model V350-Pro Mig welder, s/n not visible
350 amp
w/ cart
- 1 King vertical boring mill, s/n n/a (Circa 1940's)
w/ 1- 5 position turret
62" diameter T-slotted table with face plate jaws
- 1 Bullard Dyn-Au-Tape NPC vertical turret lathe,
s/n 321-83, with 5 position turret
46" diameter work table (not in operation)
- 1 Milwaukee model H horizontal milling machine, s/n 57-4939
(not operating)
- 1 G&L model 45 table type horizontal boring drilling and milling
Machine, 5" spindle, s/n 269 (1943), 48" x 96" table
(machine currently under repair)
- 1 Cincinnati Bickford Super Service radial arm drill, s/n 6E945
(1954), 7'-0 arm x 19" column, dual base
w/ 2- box tables, 24" x 30"
- 1 Bullard Cut Master 30" vertical turret lathe, s/n 17588 (1941)
30" chuck diameter, w/ 5 position turret head
- 1 Clausing Startrite model H250M horizontal bandsaw,
s/n 127547 w/ roller stand
- 1 Lincoln model R3R-300 DC arc welder, s/n not visible
- 1 Southwestern model TRAK-FHM7 CNC 3 axis vertical milling
Machine, s/n 091CY62454
w/ 14" x 76" table
w/ Proto Trak SMX CNC control
- 1 Ikegai model A20 engine lathe, s/n 14342TY1 (12/69), 20" x 60"
w/ 4 jaw chuck tool holder, tailstock, coolant spray
- 1 Ikegai model A20 engine lathe, s/n 11908TY1 (8/68), 20" x 60"
w/ 4 jaw chuck tool holder, tailstock, coolant spray
- 1 Southwestern model Trak TRL2460SX CNC lathe,
s/n 074CV15981, 24" x 60"
w/ Proto Track SXL CNC control, s/n 4655 (10/9/07)

- 1 Monarch 14C engine lathe, s/n C8300 (7/1940), 16.5" x 54"
w/ 4 jaw chuck, tool holder, tailstock, steady rest,
coolant spray
- 1 TOS Trencin model SN55B-71B engine lathe, s/n 055400780066
24" x 186"
w/ - 4 jaw chuck, tool holder, tailstock, 2- steady rests
- 1 Morrison model K keyseater, s/n K965113, 1 1/4" capacity
- 1 Sidney Machine Tool engine lathe, s/n 6200 (2-18-1938)
24" x 272"
w/ 4 jaw chuck, tool holder, tailstock, 2- steady rests
- 1 Cincinnati No. 4 horizontal milling machine, s/n 4A4P1L-42
w/ 16" x 79" table
w/ Troyhe R-12 rotary table
- 1 Lincoln model CV-300 (10180) welder, s/n U1990203061
w/ Lincoln model LN-7 wire feeder
- 1 Graymill model 300-A Clean-O-Matic parts equipment washer
- 1 Supermill model J horizontal boring mill, s/n 141-1, 3 1/2"
w/ 41" x 56" T-slot table
- 1 Cincinnati No. 4 vertical milling machine, s/n 4A4V1J-21
w/ 16" x 80" table w/ 14" milling vise
- 1 DoAll/Anayak universal milling machine, s/n 5734-5
w/ 12" x 53" table
(not in operation)
- 1 Cincinnati 21 stationary drill press, s/n 1LF1J5E-14, 1 H.P.
- 1 Lagun model FT-2 vertical milling machine, s/n n/1
w/ 10" x 50" power feed table
w/ Sokki DU102 X-Y dro (not connected)
(not in operation)
- 1 Southwestern Sport K4 CNC 3 Axis vertical milling machine
s/n 013BN10190
w/ 10" x 50" table w/ Kurt 6" milling vise
w/ SWI Proto Trak M2 3 axis CNC control

- 1 South Bend Turn-Nado 17" (CL170E) engine lathe,
s/n 67 GJ1410, 17" x 72"
w/ 4 jaw chuck, tool holder, tailstock
- 1 Armstrong-Blum Marvel No. 8 vertical bandsaw, s/n not visible
- 1 Bridgeport vertical milling machine, s/n 12BR91753 (1965)
w/ 1.0 H.P. head
w/ 9" x 42" power feed table w/ 6" milling vise
- 1 Bridgeport vertical milling machine, s/n 12BR137026 (1969)
w/ 1.0 H.P. head
w/ 9" x 42" power feed table
- 1 Milwaukee model H horizontal milling machine, s/n 29-2843
w/ 10" x 52" table
- 1 Brown & Sharpe No. 2 surface grinder, s/n not visible
w/ 6" x 18" electromagnetic chuck
(not in operation)
- 1 Robbins & Myers double girder top running bridge crane,
35'-0 span
w/ 7 1/2 ton cable hoist w/ pendant control
w/ motorized trolley
w/ Runway ~120'-0 long
w/ 11- vertical I-beam supports
- 2 Robbins & Meyer top running double girder bridge cranes,
35'-0 span
Each w/ 7 1/2 ton cable hoist w/ pendant control
w/ motorized trolley
w/ runway ~195'-0 long w/ 16 vertical I-beam support
- 1 Yale model GLP155CANGBV127 LPG forklift truck
s/n B878Vo1658B, 7,350 lb. capacity, 173" lift height
w/ side shifter
w/ pneumatic tires
- 1 Group of welding equipment consisting of:
 - 1- Lincoln LN-8 multiprocess wire feeder, s/n 60446
w/ custom cart
 - 1- Lincoln Hi-Freq high frequency generator (8001)
w/ portable stand
 - 1- Lincoln LN-7 (10363) wire feeder, s/n U1990
w/ portable cart

- 1 Group of general plant equipment consisting of:
 - 1- Global hydraulic pallet jack
 - 1- Toro Recycler gas lawn mower, 6.75 H.P.
 - 1- metal hand truck
 - 1- group of custom steel single and double side cantilever Stock racks
 - 2- custom steel I-beam spanner bars
 - 6- assorted roller and T-stands
 - 1- strapping cart w/ tools
 - 1- steel top/I-beam table, 48" x 144"
 - 1- steel work table, 72" x 144" x 2" w/ cut-outs
 - 1- steel work bench w/ Reed 5" vise
 - 2- oxygen/acetylene welding outfits w/ hose, torch, gages and carts
 - 1- steel jobsite tool chest
 - 2- assorted Henkel welding rod ovens, model K-50 & K-200
 - 1- 4 1/2" vise w/ pedestal stand
 - 2- pair of assorted steel saw horses
 - 1- steel T-slot work table, 48" x 144" x 6"
 - 2- Husky Jobsite tool chests
 - 1- Gullco model 125 electrode oven
 - 1- steel welding table, 40" x 67"
 - 2- assorted 2 tier metal carts
 - 2- Galbreath model TH-100 self dumping hoppers
 - 1- cu. yard capacity
 - 2- assorted self dumping hoppers, no name visible
 - 5- assorted pedestal fans
 - 1- custom 3 section rack/gas cylinder storage
 - 1- Dayton 36" air circulator
 - 1- 4 section steel cantilever rack
 - 1- 6" double end carbide pedestal grinder, no name Taiwan 1996, 1/2 H.P.
 - 2- Milwaukee model 4202 magnet base drills
 - 5- assorted 2 drawer metal file cabinets
 - 1- steel T-slot work bench, 39 1/2" x 83 1/2" w/ double end bench grinder w/ No. 3 arbor press w/ Ridgid 5" vise
 - 1- double end pedestal grinder, no name visible
 - 1- Eagle 2 door flammable storage cabinet, 42" high
 - 1- Triangle PC3613 air circulator
 - 1- Walker Turner double end pedestal grinder, 1/2 H.P.
 - 1- 2 tier metal cart

Cont...

- 1- metal work bench
 - w/ 4 1/2" vise
 - w/ 6" milling vise
- 1- steel waste oil tank
- 1- 14" milling vise w/ cart
- 1- Ridgid 700 power head
- 1- welding tank cart
- 1- steel table w/ 6" vise
- 1- Delta pedestal drill press
- 1- U.S. Electrical double end pedestal grinder, 2 H.P.
- 1- Jet model JSG-6 combination 6" belt/12" disc grinder
- 1- Jet model JBG-8A, 8" double end pedestal grinder, 1 H.P.
- 1- vertical belt grinder, 1" wide w/ pedestal stand
- 1- 8'-0 fiberglass step ladder
- 2- 12'-0 aluminum step ladders
- 1- 12'-0 wood step ladder
- 1- 10'-0 fiberglass step ladder
- 1- 12'-0 fiberglass step ladder
- 1- 32'-0 fiberglass extension ladder
- 1- 16'-0 aluminum ladder
- 1- section of bakers scaffolding

- 1 Contents of parts/tool room consisting of:
- 2- 20'-0 steel storage containers (each has one door off)
 - 2- sections of 4 tier pallet rack
 - 1- Rong Fu model RFO-30 bench-top milling/drilling machine
 - 1- Miller model WC-115A weld control
 - 1- Hydra-Power model A30-10-1 portable hydraulic pump
 - s/n 6856-8
 - 1- group of assorted cabinets and shelving units
 - 1- lot of assorted precision measuring equipment (old)
 - 1- lube drum w/ pneumatic pump
 - 1- Westward model 5Z010A hydraulic engine crane,
 - 1,500 lb. capacity
 - 1- plastic Gas Kart w/ assorted plastic gas cans
 - 1- Husky portable gas powered pressure washer, 3000 Psi
 - 2- assorted portable gas powered air compressors
 - (Ridgid & no name)
 - 1- Predator 4000 portable gas powered generator, 4,000 watt
 - 7- assorted shop vacuums
 - 1- Lincoln Electric Weld Pak (10949)
 - 6- Lincoln LN-25 wire feeders

Cont...

- 1- group of rigging, fall protection equipment, chain hoist screw jacks, hydraulic jacks, jack stands, equipment dollies, and etc.
- 1- lot of assorted fastening hardware
- 1- lot of assorted tooling, reamers, dies, broachs lathe tooling, taps, drill bits, and etc.
(located here and through-out facility)
- 2- metal barrel hand trucks
- 1- lot of assorted welding hose
- 1- group of assorted electric and pneumatic hand tools, reciprocating saws, drills, grinders, cut-off saws, and etc.
- 1- Napa battery charger
- 1- group of assorted hand tools, wrenches, sockets, C-clamps and etc.
- 1- lot of assorted welding rod
- 1- Whitney Jensen foot shear, 36"

Compressor Room

- 1 Joy Twistair model 020TAN2D rotary screw air compressor
s/n 147334
w/ 20 H.P. motor
w/ horizontal tank
- 1 Air compressor
w/ 5 H.P. motor
w/ horizontal tank

Outside Building

- 1 Morris Wheeler pedestal jib crane, 18'-0 arm, 2 ton capacity
w/ Yale manual chain hoist, 1 1/2 ton capacity
- 2 LPG storage cages
- 1 Sullivan model D100Q6 portable air compressor, s/n 30118
w/ 4 cylinder diesel engine
100 PSIG (poor condition)

VEHICLES

QTY.	DESCRIPTION	FORCED SALE VALUE
1	1996 Chevrolet K3500 Cheyenne single axle flatbed truck VIN 1GBJK34J9TE266048 118,323 miles indicated on odometer w/ automatic transmission w/ 7.4L V8 engine w/ 4 wheel drive w/ 10'-0 steel flatbed body Interior very poor condition Body damage left front Body rotted and rusted in numerous places	
1	1999 Ford F150 regular cab pick-up truck VIN 1FTZF1725XNB88773 Mileage approximately 230,000 w/ automatic transmission w/ 4.2L V6 engine (not physically inspected)	
1	2001 Ford F350 Super Duty XL regular cab pick-up truck VIN 1FDWF36F81EB42988 Mileage approximately 100,000 w/ automatic transmission w/ 7.3 L V8 Turbo Diesel engine (not physically inspected)	
1	2002 Dodge Dakota SLT regular cab pick-up truck VIN 1B7HG48N22S615047 Mileage approximately 180,000 w/ automatic transmission w/ 4.7L V8 engine (not physically inspected)	
1	2010 Honda Accord EX 4 door sedan VIN 1HGCP2F77AA150161 Mileage approximately 100,000 w/ automatic transmission w/ 2.4L 4 cylinder engine (not physically inspected)	



EXHIBIT B

NEW YORK | CHICAGO | LOS ANGELES

September 17, 2015

SENT VIA EMAIL

Ms. Jennifer Billand
White Marine
500 Division Street
Perth Amboy, NJ 08861

Re: Offer to Purchase – the Equipment at 500 Division Street, Perth Amboy, NJ (known herein
after as the “Facility”)

Dear Ms. Billand:

Reich Brothers, LLC, or its assignee (the “Buyer”) hereby offers to purchase the equipment at the
above reference property (the “Facility”) upon the following terms and conditions (the “Offer”):

1. Purchase Price: One Hundred and Fifteen Thousand Eight Hundred and Twenty Eight dollars
(\$115,828), subject to acquiring the assets (“Assets”) identified in the attached lists.
2. Occupancy: 60-90 days at no cost to conduct an auction/liquidation sale.
3. All Assets to be conveyed to Buyer pursuant to a bankruptcy court order free and clear of all
liens, claims, and incumbences.
4. Inspection Period: A final inspection to confirm the Assets.
5. A mutually agreeable contract.

Please let us know if you wish to proceed.

Very truly yours,


Jonathan Reich
Co-CEO, Reich Brothers, LLC